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February 28, 2023

VIA CM/ECFHonorable James L. Cott
United States District Court
500 Pearl Street
New York, NY 10007**Re: Matchroom Boxing Limited, et al v. Jake Paul**
Case No. 1:22-cv-08178-PGG

Your Honor:

The parties submit this joint letter pursuant to Rule I (E) of the Court's Individual Practices, and in connection with the parties ongoing discovery disputes as outlined in counsel's correspondence dated February 20, 2023 and February 21, 2023. Notably, pursuant to Your Honor's Order dated February 21, 2023, the parties engaged in a subsequent meet and confer on February 27, 2023, and have resolved their discovery disputes.

Due to Plaintiffs' counsel traveling internationally between February 25th and March 6, 2023, and Defendant's counsel being unavailable between March 14th-17th for grand jury service, the parties have agreed to the following deposition schedule:

- (i) Plaintiff-Intervenor Glenn Feldman on March 8, 2023;
- (ii) Defendant Jake Paul on March 20, 2023;
- (iii) By 5:00 pm on March 3, 2023, Plaintiffs will provide Defendant with two proposed deposition dates for each of Matchroom Boxing and Eddie Hearn which dates will be before close of discovery; and
- (iv) Further, the parties have agreed to limit each deposition to 3.5 hours.

In light of the foregoing, the parties have also agreed and respectfully request that the Court enter an Order as to the following discovery and briefing schedule:

- (i) Jurisdictional discovery be extended to March 31, 2023. Accordingly, the parties will notify the Court on or before March 31, 2023, as to whether the parties wish to engage in a settlement conference, or alternatively be referred to the Court mediation program;
- (ii) Defendant's motion to dismiss/transfer on jurisdictional and/or venue grounds be filed by April 28, 2023;
- (iii) Plaintiffs' opposition papers to be filed by May 17, 2023; and
- (iv) Defendant's reply papers to be filed by June 2, 2023.

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Respectfully Submitted,

Dated: New York, New York
February 28, 2023

/Frank Salzano, Esq./
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